

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

No. 0:24-cv-61322-AHS

THE HARTZ MOUNTAIN
CORPORATION

Plaintiff,

v.

BOCA DEALS LLC d/b/a
AMAZON SELLER BOCA DEALS

Defendant.

_____ /

UNOPPOSED MOTION FOR ENLARGEMENT OF TIME

Defendant Boca Deals LLC d/b/a Amazon Seller Boca Deals, through its undersigned counsel, files this Unopposed Motion for an Enlargement of Time to Respond to the Complaint.

1. On July 25, 2024, Plaintiff filed this action alleging false advertising and false designation of origin under the Lanham Act, 15 U.S.C. §1051 *et seq.* and violation of the Florida Deceptive and Unfair Trade Practices Act, Fla. Stat. §§501.201-501.213.

2. Undersigned counsel and Plaintiff's counsel began negotiations toward a settlement of all claims. On August 15, 2024, Defendant moved for an enlargement of time to respond to the complaint so that the parties could reach a settlement [ECF 9]. On August 16, 2024, the Court entered an Order extending Defendant's time to respond to the complaint to August 30, 2024. [ECF 10]

3. Settlement talks are ongoing and the parties continue to work productively towards a final settlement agreement. However, more time is needed in order to resolve several outstanding issues.

4. Federal Rule of Civil Procedure 6(b)(1)(A) provides that the Court may, for good cause, extend a party's time to comply with a Rule before the original time or its extension expires. See Fed. R. Civ. P. 6(b)(1)(A). A brief extension of time will enable the parties to finalize a settlement agreement, avoid unnecessary expense, and preserve the Court's resources.

Accordingly, Defendant respectfully requests that the Court enter an order enlarging Defendant's time to respond to the complaint through and including September 25, 2024 so that the parties can fully resolve the litigation.

Local Rule 7.1(a)(3) Certification

Undersigned counsel for Defendant has communicated with Plaintiff's counsel regarding the relief sought herein, and is authorized to represent that Plaintiff consents to the requested relief.

Dated: August 28, 2024

Respectfully submitted,

LAW OFFICES OF SARA A. GOLDBERG, P.A.

/s/ Sara A. Goldberg
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Counsel for Defendant Boca Deals LLC

CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all counsel of record in this litigation.

/s/ Sara A. Goldberg
Sara A. Goldberg